

Exhibit B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HELEN HANKS, on behalf of herself and all
others similarly situated,

Plaintiff,

vs.

THE LINCOLN LIFE & ANNUITY
COMPANY OF NEW YORK; VOYA
RETIREMENT INSURANCE AND
ANNUITY COMPANY, formerly
known as Aetna Life Insurance and
Annuity Company,

Defendants.

Civil Action No. 16-cv-6399

**DECLARATION OF
JENNIFER M. KEOUGH
IN SUPPORT OF
PROOF OF MAILING AND
WEBSITE POSTING**

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am the Chief Executive Officer of JND Legal Administration LLC (“JND”). JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

2. JND is serving as the Notice Administrator in the above-captioned litigation (“Action”) for the purposes of administering the Notice of Pendency approved by the Court in its Order Approving Form and Manner of Notice to the Class, dated April 23, 2019. The following statements are based on my personal knowledge and information provided to me by other JND employees working under my supervision, and if called on to do so, I could and would testify competently thereto.

3. JND is one of the leading legal administration firms in the country, and the principals of JND, including myself, collectively have over 75 years of experience in class action

legal and administrative fields. JND's class action division provides all services necessary for the effective implementation of class action settlements including: (1) all facets of legal notice, such as outbound mailing, email notification, and the design and implementation of media programs, including through digital and social media platforms; (2) website design and deployment, including online claim filing capabilities; (3) call center and other contact support; (4) secure class member data management; (5) paper and electronic claims processing; (6) calculation design and programming; (7) payment disbursements through check, wire, PayPal, merchandise credits, and other means; (8) qualified settlement fund tax reporting; (9) banking services and reporting; and (10) all other functions related to the secure and accurate administration of class action settlements. JND has been recognized by various publications, including the National Law Journal and the Legal Times, and most recently, the New York Law Journal, for excellence in class action administration.

DATA TRANSFER

4. On May 23, 2019, Plaintiffs provided JND with the list of Class Members, which included names, policy numbers, and physical addresses, among other information.

5. The Class Member data was promptly loaded into a database established for this Action.

POSTCARD NOTICE

6. Pursuant to the terms of the Order Approving Form and Notice, JND mailed the Short-Form (Postcard) Notice approved by the Court in its April 23, 2019 order via first-class regular U.S. mail to the 47,308 Class Members.

7. Prior to mailing, JND updated 1,276 Class Member addresses using the United States Postal Service National Change of Address database¹.

TOLL-FREE INFORMATION LINE

8. On June 13, 2019, JND established a case-specific toll-free number, 1-833-759-2984, for individuals to call to obtain information about the Lawsuit. The line is available 24 hours a day, seven days a week.

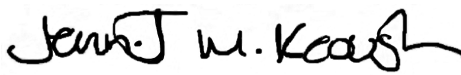
WEBSITE

9. On June 13, 2019, JND established a Notice Website, www.Voyacoilitigation.com, to provide additional information to the Class Members and answer frequently asked questions. Viewers of the website can download a copy of the Class Action Complaint, Order Certifying Class, Order Approving Form and Notice, and the Long Form Notice.

10. As of June 24, 2019, the website has received 277 unique visitors for a total of 1,017 pageviews and the case-specific toll-free number has received 208 calls.

I declare under the penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed on June 27, 2019 at Seattle, Washington.

By: 
JENNIFER M. KEOUGH

¹ The NCOA database is the official United States Postal Service (“USPS”) technology product which makes change of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This product is an effective tool to update address changes when a person has completed a change of address form with the USPS. The address is maintained in the database for 48 months.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been served on the following counsel, this June 27, 2019.

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***Attorneys for The Lincoln Life & Annuity Company of New York and
Voya Retirement Insurance and Annuity Company, formerly known
as Aetna Life Insurance and Annuity Company***

/s/ Nicholas N. Spear

Nicholas N. Spear